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8 Attorneys for Defendants
TRIEME MEDICAL, LLC,
9 EITAN KONSTANTINO,
QUATTRO VASCULAR PTE LTD.,
10 and QT VASCULAR LTD.

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 OAKLAND DIVISION
14

15 ANGIOSCORE, INC.,
16 Plaintiff,

17 v.

18 TRIEME MEDICAL, LLC (f/k/a TRIEME
MEDICAL, INC.), EITAN KONSTANTINO,
19 QUATTRO VASCULAR PTE LTD., and QT
VASCULAR LTD. (f/k/a QT VASCULAR PTE.
20 LTD.),

21 Defendants.
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CASE NO.: 4:12-CV-3393-YGR

**DECLARATION OF SHEILA N.
SWAROOP IN SUPPORT OF
DEFENDANTS' MOTION FOR
ATTORNEYS' FEES**

1 I, Sheila N. Swaroop, hereby declare as follows:

2 1. I am a partner at Knobbe, Martens, Olson and Bear LLP ("Knobbe Martens"),
3 which represented Defendants TriReme Medical, LLC, Quattro Vascular Pte Ltd., QT Vascular
4 Ltd. and Eitan Konstantino (collectively "Defendants") in this matter. I make this declaration of
5 my own personal knowledge and, if called as a witness, could and would testify to the matters
6 contained herein.

7 2. Knobbe Martens served as counsel for Defendants in this matter from July 2012
8 through October 2014. Knobbe Martens is among America's largest intellectual property law
9 firms with approximately 260 attorneys and offices across the West Coast and in Washington,
10 D.C.

11 3. For the time period of July 2012 through October 2014, Knobbe Martens
12 maintained invoices for the fees incurred by our firm on this matter, including fees relating to the
13 patent issues in this case. Attached hereto as Exhibit A are true and correct copies of the invoices
14 billed to Defendants in this case during this time period. I understand that certain redactions have
15 been made to these invoices to shield sensitive financial account numbers and privileged and work
16 product information. These invoices include individual time entries, including hours and billing
17 rate for each timekeeper who worked on this case for Defendants. In addition, I understand that
18 time entries that do not relate to patent issues in this case have been highlighted in yellow. These
19 invoices also include statements of the payments received from Defendants. These invoices were
20 prepared by Knobbe Martens' accounting department and are maintained at Knobbe Martens. As
21 reflected in the invoices included in Exhibit A, Knobbe Martens exercised billing judgment with
22 respect to the claimed number of hours worked and billed, and adjusted several of its invoices
23 downward. The total fees billed by Knobbe Martens to Defendants for professional fees relating
24 patent matters in this case are reflected in Exhibit A.

25 4. The invoices in Exhibit A include the time that I personally recorded to the patent
26 issues in this matter. I received my J.D. from UC Berkeley in 1999, and I hold a B.A. in Biology
27 from Harvard University. After law school, I clerked for Hon. Sandra Brown Armstrong in the
28 Northern District of California. Since finishing my clerkship, I have specialized in the litigation of

1 intellectual property disputes in Federal Court and before the U.S. International Trade
2 Commission ("ITC"). I have been named a Southern California "Rising Star" every year since
3 2005. My work on this case has included overall management of the case, preparation of
4 numerous briefs, presentation of argument on multiple motions and other matters in Oakland, CA,
5 and the preparation and defense of fact and expert witnesses at deposition. Attached hereto as
6 Exhibit B is a true and correct copy of a printout from the website www.knobbe.com, which
7 summarizes my credentials. My billing rate at Knobbe Martens during the time periods for these
8 invoices ranged from \$540-\$595/hour.

9 5. The invoices in Exhibit A also reflect the time that other attorneys at Knobbe
10 Martens recorded to the patent issues in this matter.

11 6. Attached hereto as Exhibit C is a true and correct copy of a printout from the
12 website www.knobbe.com, which summarizes the credentials of Joseph R. Re, the lead counsel
13 for Knobbe Martens in this matter. Mr. Re is a partner at Knobbe Martens, and his billing rate
14 during the time periods for these invoices ranged from \$760-\$810/hour.

15 7. Attached hereto as Exhibit D is a true and correct copy of a printout from the
16 website www.knobbe.com, which summarizes the credentials of Gerard von Hoffman. Mr. von
17 Hoffman is a partner at Knobbe Martens. Mr. von Hoffman's billing rate at Knobbe Martens
18 during the time periods for these invoices ranged from \$725-\$775/hour.

19 8. Attached hereto as Exhibit E is a true and correct copy of a printout from the
20 website www.knobbe.com, which summarizes the credentials of Joshua Stowell. Mr. Stowell is a
21 partner at Knobbe Martens, and his billing rate during the time periods for these invoices ranged
22 from \$425-\$485/hour.

23 9. Attached hereto as Exhibit F is a true and correct copy of a printout from the
24 website www.knobbe.com, which summarizes the credentials of Mark Kachner. At the time of
25 my firm's involvement in this lawsuit, Mr. Kachner was an associate at Knobbe Martens, and his
26 billing rate during the time periods for these invoices was \$455/hour.

27 10. Attached hereto as Exhibit G is a true and correct copy of a printout from the
28 website www.knobbe.com, which summarizes the credentials of Alan Laquer. Mr. Laquer is

1 currently a partner at Knobbe Martens, and his billing rate during the time periods for these
2 invoices was \$450/hour.

3 11. Attached hereto as Exhibit H is a true and correct copy of a printout from the
4 website www.knobbe.com, which summarizes the credentials of Laura Hall. Ms. Hall is an
5 associate at Knobbe Martens, and her billing rate during the time periods for these invoices ranged
6 from \$335-\$375/hour.

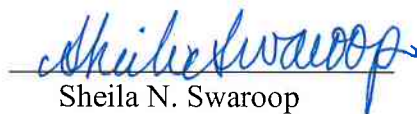
7 12. Attached hereto as Exhibit I is a true and correct copy of a printout from the
8 website www.knobbe.com, which summarizes the credentials of Christie Matthaei. Ms. Matthaei
9 is an associate at Knobbe Martens, and her billing rate during the time periods for these invoices
10 ranged from \$295-\$375/hour.

11 13. Attached hereto as Exhibit J is a true and correct copy of a printout from the
12 website www.knobbe.com, which summarizes the credentials of Yifang C. Zhao. Ms. Zhao was a
13 summer associate in 2013 and is currently an associate at Knobbe Martens. Her billing rate during
14 the time periods for these invoices was \$200/hour.

15 14. It is my understanding that patent litigation matters are generally more active than
16 many other types of cases litigated in federal court. Patent cases involve unique law and unique
17 proceedings and issues, such as claim construction, infringement and invalidity. The fees incurred
18 by Knobbe Martens for this litigation are consistent with published industry reports regarding the
19 typical fees incurred in patent litigation.

20
21 I declare under penalty of perjury under the laws of the United States of America that the
22 foregoing is true and correct.

23 Dated: October 28, 2015


Sheila N. Swaroop